

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

AMYRIS, INC., *et al.*

Debtors.¹

Chapter 11

Case No. 23-11131 (TMH)

(Jointly Administered)

Re. Docket No. 614

**CERTIFICATION OF COUNSEL REGARDING
MOTION OF THE AD HOC NOTEHOLDER GROUP FOR AN ORDER PURSUANT
TO BANKRUPTCY RULE 2004 AND LOCAL BANKRUPTCY RULE 2004-1
DIRECTING THE PRODUCTION OF DOCUMENTS BY THE FORIS LENDERS**

The undersigned hereby certifies as follows:

On October 24, 2023, Ad Hoc Group of Holders of 1.50% Convertible Senior Notes due 2026 (the “Ad Hoc Group”) filed the *Motion of the Ad Hoc Noteholder Group for an Order Pursuant to Bankruptcy Rule 2004 and Local Bankruptcy Rule 2004-1 Directing the Production of Documents by the Foris Lenders* [Docket No. 614] (the “Motion”) with the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801 (the “Court”).

On November 6, 2023, the Court held a hearing (the “Hearing”) to consider, among other things, the Motion.

Consistent with the record at the Hearing, a copy of the revised, proposed form of order (the “Revised Proposed Order”) is attached hereto as **Exhibit A**, reflecting comments received from the Foris Lenders and agreed to by the parties. Attached hereto as **Exhibit B** is a blackline of the Revised Proposed Order marked against the form of order filed with the Motion.

¹ A complete list of each of the Debtors in these Chapter 11 Cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://cases.stretto.com/amyris>. The location of Debtor Amyris Inc.’s principal place of business and the Debtors’ service address in these Chapter 11 Cases is 5885 Hollis Street, Suite 100, Emeryville, CA 94608.

WHEREFORE, the Ad Hoc Group respectfully requests entry of the Revised Proposed Order attached hereto as **Exhibit A** at the earliest convenience of the Court.

Dated: November 9, 2023

BLANK ROME LLP

/s/ Stanley B. Tarr

Stanley B. Tarr (DE No. 5535)
Lawrence R. Thomas III (DE No. 6935)
1201 N. Market Street, Suite 800
Wilmington, DE 19801
Tel.: (302) 425-6400
Fax: (302) 425-6464
stanley.tarr@blankrome.com
lorenzo.thomas@blankrome.com

MOLOLAMKEN LLP

Steven F. Molo
Justin M. Ellis
Sara E. Margolis
Mark W. Kelley
Catherine Martinez
430 Park Avenue
New York, NY 10022
Tel.: (212) 607-8160
smolo@mololamken.com
jellis@mololamken.com
smargolis@mololamken.com
mkelley@mololamken.com
cmartinez@mololamken.com

Counsel to the Ad Hoc Noteholder Group